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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL LETTER BRIEF
FOR TELEPHONIC HEARING**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal their Letter Brief for Telephonic Hearing (“Letter”). Specifically, Defendants request an order granting leave to file under seal the following confidential documents:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief for Telephonic Hearing (“Letter”)	Highlighted Portions	Defendants (Blue) Plaintiff (Green)
Exhibits 1 and 2	Entirety	Plaintiff

The blue-highlighted portions of the Letter discuss confidential information relating to certain confidential proceedings between Uber and certain former employees, which should be maintained as confidential subject to an agreement between parties to those proceedings. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.)

The blue-highlighted portions of the Letter discuss confidential information relating to technology measures considered for application within Uber. This information is maintained as confidential. Disclosure of this sensitive information could reveal Uber’s strategy and technology capabilities. (Yang Decl. ¶ 4.)

The green-highlighted portions of the Letter and Exhibits 1 and 2 contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” or “Confidential” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on December 12, 2017.

1 For the foregoing reasons, Defendants request that the Court enter the accompanying
2 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and
3 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –
4 ATTORNEYS' EYES ONLY."

5 Dated: December 12, 2017

MORRISON & FOERSTER LLP

7 By: /s/ Arturo J. Gonzalez
8 ARTURO J. GONZALEZ

9 Attorneys for Defendants
10 UBER TECHNOLOGIES, INC. and
11 OTTOMOTTO LLC
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